

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED SOVEREIGN AMERICANS, INC.,
BERNARD JOHNSON, AND CITIZENS
DEFENDING FREEDOM

Plaintiffs,

v.

JANE NELSON, in her official capacity as the
Secretary of State of Texas, KEN PAXTON, in his
official capacity as the Attorney General of Texas, and
MERRICK GARLAND, in his official capacity as
Attorney General of the United States

Defendants,

Case No. 2:24-cv-00184

**TEXAS STATE CONFERENCE OF THE NAACP AND LEAGUE OF WOMEN
VOTERS OF TEXAS' MOTION TO INTERVENE**

Proposed Intervenor-Defendants ("Proposed Intervenors") Texas State Conference of the NAACP ("Texas NAACP") and the League of Women Voters of Texas ("LWVTX" or "the League") hereby files this Motion to Intervene as Defendants in this action. As explained in the Texas NAACP and LWVTX's Brief in Support of this Motion filed herewith, Texas NAACP and LWVTX are entitled to intervene as a matter of right pursuant to Federal Rule of Civil Procedure ("Rule") 24(a)(2) or, in the alternative, should be permitted to intervene pursuant to Rule 24(b).

This Motion is accompanied by a Brief in Support of the Motion, a Proposed Order, and an Appendix containing declarations by Proposed Intervenors. Proposed Intervenors also attach their Motion to Dismiss and supporting documents to be filed in the event that intervention is granted.

Dated: October 9, 2024

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I certify that on October 8, 2024, pursuant to Local Rule 7.1(a), I reached out to Counsel for Plaintiffs, State Defendants, and Federal Defendant in this matter regarding this Motion. I requested that all Counsel of Record provide their positions on Intervention. On October 9, 2024, Counsel for Plaintiffs responded via email that Plaintiffs oppose intervention, Counsel for the State Defendants responded via email that they take no position on Intervention, and Counsel for Federal Defendant responded via email that DOJ opposes Intervention as to the claims against the U.S. Attorney General.



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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was filed via the court's CM/ECF system on October 9, 2024, which will serve all counsel of record.

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